

## **REMARKS**

Claims 1-42 are cancelled. New claims 43-78 are added.

### **Rejections under 35 U.S.C. §112**

Applicants respectfully submit that the newly submitted claims overcome the Examiner's objection under 35 U.S.C. §112.

### **Rejections under 35 U.S.C. §102**

Claims 1-4, 6-34 and 41-42 are rejected under 35 U.S.C. 103 as being anticipated by Walker et al. (U.S. Patent No. 6,193,155). We draw the Examiner's attention to the fact that Walker does not recite all of the features of the amended independent claims. In particular, the Examiner contends that Walker discloses the issuance of a random alphanumeric token. This is incorrect. Walker is completely silent on the generation of a random alphanumeric token. Indeed, the only embodiment described in the Walker specification is a "16 digit numeric value, which has not been previously assigned to an existing credit card account, so as to be compatible with conventional credit card transactions processing systems" (see column 5, lines 19 to 23).

Moreover, while the Examiner refers to element 818 of figure 5 or any of elements 510, 520 or 512, the specification as a whole teaches that each of these values are somehow associated with an existing credit card account. See for example column 7, lines 21 to 23, which states that "each record of certificate table 500 also includes account identifier field 512 which acts as a pointer to the associated credit card account".

Similarly, at column 8, lines 66 through to column 9, line 1, it is stated "a 16 digit certificate identifier 818 is, in fact, a corresponding alias account number". In other words, the system of Walker et al. does not produce a randomly generated alphanumeric token, as any number utilized by Walker must, by definition, accord to an existing account (such as a credit card account).

The Examiner's attention is drawn to the fact that the provision of a random number produces concrete and tangible results over the systems disclosed in the prior art.

That is, the use of a random number prevents a third party from “guessing” probable certificate numbers. The prior art, by using numbers which are compatible with existing credit card authorization systems, allow the possibility that a person with a working knowledge of credit card systems may be able to generate “valid” certificate numbers, thereby thwarting the system. Moreover, the system of the prior art, by utilizing credit card compatible numbers, must, by definition, require some form of link with existing credit card system providers (such as American Express, Visa and/or MasterCard). This requires some type of ongoing technical relationship/connection with such credit card system providers. This in turn creates a further security vulnerability, as it is necessary for the system of Walker to somehow contact credit card number providers to ensure that the temporary number generated by the system of Walker does not conflict with existing credit card numbers.

Therefore, the Applicant contends that the feature of randomly generating an alphanumeric token provides a number of advantages over the system described in Walker et al. Applicant submits that the rejections under 35 U.S.C. §102 are improper because Walker et al. does not anticipate the invention as particularly claimed. Reconsideration is respectfully requested.

### **Rejections under 35 U.S.C. §103**

Claims 1-4, 6-34 and 41-42 are rejected under 35 U.S.C. 103 as being unpatentable over Fortenberry et al. (WO 99/302256) in view of any one of Manasse (WO 97/03423), Scroggie et al. (U.S. Patent No. 6,014,634) or Jacoves et al. (U.S. Patent No. 6,741,968). We again draw the Examiner’s attention to the fact that none of the documents cited by the Examiner contemplate the creation of a randomly generated alphanumeric token. Therefore, the arguments above with regard to the rejections under 35 U.S.C. §102 apply equally to the obviousness objection raised by the Examiner. Since no combination of the cited references teaches or suggests each and every element of the rejected claims, Applicant respectfully submits that the rejections under 35 U.S.C. §103 are improper and should be withdrawn. Reconsideration is respectfully requested.

### CONCLUSION

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below. The Examiner is invited and encouraged to telephone the undersigned with any concerns in furtherance of the prosecution of the present application.

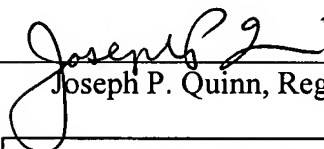
Please charge any deficiency as well as any other fee(s) which may become due at any time during the pendency of this application, or credit any overpayment of such fee(s) to Deposit Account No. 19-1351. Also, in the event any extensions of time for responding are required for the pending application(s), please treat this paper as a petition to extend the time as required and charge Deposit Account No. 19-1351 therefore.

Respectfully Submitted,

Date:

8/7/07

SEYFARTH SHAW LLP  
131 S. Dearborn Street  
Suite 2400  
Chicago, Illinois 60603-5577  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000



Joseph P. Quinn, Reg. No. 45,029

#### **CERTIFICATE OF MAILING**

I hereby certify that this paper is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, Mail Stop: Amendment

Date: August 7, 2007



Deborah E. Dudek